

**Form of Stipulation for Entry of Judgment on Counterclaim  
Provided for in Settlement--Refund Suit with Counterclaim or  
Third-Party Claim**

IN THE UNITED STATES DISTRICT COURT FOR THE  
\_\_\_\_\_ DISTRICT OF \_\_\_\_\_

[NAME(S) OF PLAINTIFF(S)]	)	
	)	
Plaintiff(s),	)	
	)	
v.	)	
	)	Civil No.
UNITED STATES	)	
	)	
Defendant,	)	
	)	
v.	)	
	)	
[NAME OF COUNTERCLAIM DEFENDANT	)	
OR THIRD-PARTY DEFENDANT]	)	
	)	
[Counterclaim] [Third-Party] Defendant.	)	
_____	)	

STIPULATION FOR [DISMISSAL AND] ENTRY OF JUDGMENT

[It is hereby stipulated and agreed that the complaint in the above-entitled case be dismissed with prejudice, the parties to bear their respective costs, including any possible attorneys' fees or other expenses of this litigation.]

It is hereby [further] stipulated and agreed that judgment may be entered in favor of the United States, and against the plaintiff, [name of plaintiff] for the unpaid assessed balance of [specify the type of tax(es) and the tax periods] and related interest and penalties in the amount of \$[specify unpaid assessed balance of all tax, penalties, and interest], [plus all penalties accruing under law after the date(s) of assessment ([specify date(s)])], plus interest accruing after the date(s) of

assessment ([specify date(s)]) pursuant to 26 U.S.C. §§ 6601, 6621, and 6622, and 28 U.S.C. § 1961(c) until paid [and] that judgment may be entered in favor of the defendant, United States, and against [the] [counterclaim defendant] [third-party defendant] [name of counterclaim defendant or third-party defendant] for the unpaid assessed balance of [specify the type of tax(es) and the tax periods] and related interest and penalties in the amount of \$[specify unpaid assessed balance of all tax, penalties, and interest], [plus all penalties accruing under law after the date(s) of assessment ([specify date(s)])], plus interest accruing after the date(s) of assessment ([specify date(s)]) pursuant to 26 U.S.C. §§ 6601, 6621, and 6622, and 28 U.S.C. § 1961(c) until paid.

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NAME OF COUNSEL FOR PLAINTIFF(S)  
[Address of Counsel]

Attorney for Plaintiff(s)

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Attorney for Defendant

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[NAME OF COUNSEL FOR COUNTERCLAIM DEFENDANT  
OR THIRD-PARTY DEFENDANT]  
[Address of Counsel]

Attorney for [Counterclaim]  
[Third-Party] Defendant

[NOTE: The following should be added at bottom of Stipulation for Entry of Judgment, if a separate order for judgment is not being used.]

[Exhibit 6]

ORDER

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_.

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United States District Judge